

EXHIBIT

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 2 reservoir so it can be used up again.

3 That was just an observation I had
 4 made that -- it's all designed to just drain
 5 right out, but like any drain, you're going to
 6 be left with a few droplets on there and that
 7 contributed to not using up as much fluid as
 8 you'd like.

9 Q. Thank you.

10 (Exhibit 14 for

11 identification, Multi-page document, copy of
 12 notebook, production numbers R 000185 through
 13 R 000243.)

14 Q. Mr. Chasen, I've placed before you
 15 Exhibit 14. Can you identify what this is?

16 A. This is my lab book, and its
 17 primary function, it's kind of like a doodle
 18 page for a lot of people. I scratch little
 19 notes and things. And what I'll do, if I run a
 20 test, I'll put some of the raw data in here and
 21 then I'll transfer that to a more formal
 22 document, just so you know what really this is.

23 Q. When we discussed at the beginning
 24 of your deposition what documents you reviewed
 25 in connection with your preparation, was this

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 2 doodle pad --

3 A. Yes, I skimmed this as well.

4 Q. You skimmed this Exhibit 14?

5 A. Yes.

6 Q. Asking you to turn your attention
 7 to page R-188, number 7 on that page says,
 8 "Drain hole in basin needs to be greater than 3
 9 million meters." Why is that so?

10 A. We wanted -- we wanted the fluid to
 11 drain out quicker. We did not want to fill the
 12 basin with fluid in our design.

13 In our design, that's actually a
 14 bad thing, to fill the basin with fluid.

15 Q. Why?

16 A. What happens is, if that -- if the
 17 heads, the cutting heads go under the fluid
 18 level -- in other words, if the level starts to
 19 rise, all of those cutters start to rotate
 20 underneath the fluid and it creates too much
 21 power draw. The shaver loads down and the power
 22 dry, the transformer can't supply enough power
 23 to the shaver to turn it, so that was a very bad
 24 thing.

25 We wanted to make sure that the

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2 fluid goes out, drains out, and goes right to
 3 the filter, kind of like your sink.

4 And some of the initial analysis of
 5 this product -- that's why I wrote this note --
 6 in testing some of these earlier designs, the
 7 pump was putting out too much fluid and the
 8 level was rising and that's what we didn't want.
 9 We wanted that to drain right out.

10 Q. Asking you to turn your attention
 11 to the next page, there's a line that starts,
 12 "Lead-in chamfers-basin ribs."

13 Can you explain what these lead-in
 14 chamfers are?

15 A. I believe for assembly purposes to
 16 put the basin in, you put some lead-in so that
 17 when you're assembling it, it kind of guides it
 18 in. That's probably what that referred to.

19 Q. Asking you to turn to page R-201,
 20 at the top it says, "SLA Model 3."

21 What is that?

22 A. Oh, stereolithography model, SLA.
 23 That's our terminology that we use
 24 for rapid prototyping of parts.

25 Stereolithography is a process by which rapid

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 2 prototypes are made.

3 You start with a computer-generated
 4 model in your computer, a 3-D model, and you
 5 send the file to these fabrication houses and
 6 they form this model in layers, one layer at a
 7 time. It starts with a vat of liquid and then a
 8 laser scans it one layer at a time from the
 9 computer-generated model and you get the
 10 complete model built.

11 It's a rapid prototyping tool and
 12 you'll probably see a lot of SLA version this or
 13 that. I tried to keep track of what version we
 14 were working with because we made very -- a lot
 15 of different iterations of models, so SLA 1
 16 would be the first model, SLA 2 would be the
 17 second and so forth and so on.

18 So "SLA model" is just a
 19 terminology for prototype.

20 Q. And each of these SLA models that
 21 you were looking at were of the cleaning device?

22 A. And/or some of the subsystems.
 23 and/or some of the components that make up the
 24 shaver.

25 Q. Asking you to turn your attention

18 (Pages 66 to 69)

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to page R-209, at the top of the page you write,
"Run until dry - i.e. same as Braun."

What does that mean?

A. You know, I was skimming through this before and I saw that sentence and I don't know what I meant there. I'm sorry, I really don't. "Dry, same as Braun" -- because if you look at the page before, it doesn't -- it's kind of like out of context.

The only thing I can think of was, it was -- I don't remember. Honestly, it was just a note that I scribbled in there. It could have been made -- I believe it refers to running the unit dry, meaning like at the end of the Braun cycle, the cleaning cycle, your fan turns on and dries the unit. There's a fan that dries it, and at the end of the cycle, it's dry. The shaver is dry.

So when I was running some of my cleaning tests, I wanted to get it to the same dryness level as the Braun unit. That's probably what that is, but I can't be 100 percent sure.

Q. Why were you using the Braun unit

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So I don't know very well how defined this is, how long -- I just mainly know from when I started on it, this is how long it took.

But prior to that, there was some -- you know, stop, go, stop, go. That kind of thing. Where it just kind of lingered.

Q. Do you know whether Rayovac started to design its own cleaning system prior to Braun's release of its Braun Syncro cleaning system?

A. I honestly don't know. I honestly don't know. Sorry.

Q. At some point Rayovac started developing the CCS-2, which is the model you've said works with the foil, the men's foil?

A. Yes. The original intent was to try to introduce both of them simultaneously, but we didn't have the resources so they decided to have us concentrate on the rotary model first.

Plus, they were having some issues with the shaver, the Haking shaver. The MS 5500 was a new shaver for Remington/Rayovac and had

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as a benchmark?

A. It was just a comparison. It was another cleaning device that we wanted to just, you know, evaluate for dryness. Competitive benchmark, I guess.

Q. What was the length of the development process for the CCS-1 product?

A. When I came on board or the whole -- from, like, inception to production?

Q. From conception until it left research and development.

A. You mean -- let me clarify a little bit the best I can.

I came on in January of '03, and approximately nine to ten months later we had our first off-tool sample.

Q. What's an --

A. Off-tool. Meaning molded, like you see here. Off-tool molded part.

Now, there was some work done prior to my arriving that you could see in the documents that show some dates back in 2001, so, I mean, you could say it went from 2001 until the end of '03. You know what I'm saying?

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some bugs in it that had to be worked out, so the shaver really wasn't ready anyway, so the R-9500, the rotary, was already in production, aside from the modifications that we had to make, so that's why that one was picked first.

Q. When was the development of the CCS-2 started up again?

A. I'd have to refer to my notes. I don't know exact dates. It was after -- we were concentrating on the rotary, and then there was a time where we were -- the design was well along and we were waiting for tooling, and then we kind of started ramping up on the CCS-2 model.

As far as exactly when, if I could look at my notes and maybe I'll find a date in here.

Q. Can you look at Exhibit 14 and see if you can find a date?

A. Let me see if I can find something for you. Actually, a better document, I'm sure you have copies of all of it, a lab book with -- it's in Excel, it's like a big Excel spreadsheet and it says "Foil Shaver Cleaning Systems" and

19 (Pages 70 to 73)

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2 it has sequential experimental dates, test one
3 was done on this date and this is what I
4 performed. Test two was performed on this date
5 and this is what was performed.
6 That would be a way better document
7 than this thing.
8 (Exhibit 15 for
9 identification, Multi-page document entitled,
10 "Development Test Report," production numbers
11 R 001048 through R 001063.)
12 A. March 10th.
13 Q. Of what year?
14 A. That's got to be '03. I should
15 have made the width column longer. It truncated
16 the last date. It's on there.
17 The first time I started looking at
18 foil was March 10th of '03, but if you look
19 here, it goes item 1 and 2, March 10th and March
20 12th I was looking at an MS-3, and it was
21 another three whole months to item 3, so I
22 started to dabble a little bit. But it wasn't
23 until June of '03 that I started really doing
24 work on the 5000 series, so maybe more accurate
25 would be June of '03 was when we kind of started

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2 they're going to say, "Well, how does it compare
3 to the Braun?", so they wanted to become
4 knowledgeable with respect to the Braun system,
5 how ours compares.
6 Q. You mentioned the MS 5500
7 before, the MS --
8 A. "Cleaning system" is probably what
9 that means, cleaning system.
10 Q. Thank you.
11 A. You might be able to buy the 5500
12 without the cleaning system -- but I'm not
13 sure -- in some markets. That may be why you
14 see that.
15 Q. When was the development of the
16 CCS-3, the women's foil shaver cleaner, begun?
17 A. May I look at my notes?
18 Q. Certainly, yes. You're referring
19 to --
20 A. Exhibit 15.
21 I first started looking, dabbling a
22 little bit in September of '03.
23 Q. Was anybody else at Rayovac working
24 on the CCS-3?
25 A. Sure.

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2 getting into that.
3 Q. And what was the motivation behind
4 the CCS-2?
5 A. To have a cleaning system for a
6 foil line, that was marketing's instructions,
7 that they wanted us to develop a cleaning system
8 for foil.
9 (Exhibit 16 for
10 identification, Two-page document, E-mails,
11 production numbers R 003569 through R 003570.)
12 Q. Mr. Chasen, Exhibit 16 are two
13 e-mails, the last one dated April 27, 2004.
14 Have you seen these before?
15 A. Can I read it?
16 Q. Sure.
17 A. It looks familiar although I was
18 not on the original distribution. It might have
19 been forwarded to me because it does look
20 familiar to me.
21 Q. Do you know why Rayovac was doing a
22 comparison between the MS 5500 CS and the Braun
23 Activator?
24 A. Most likely it was for sales force;
25 and if they're going to sell this product,

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1 JAMES CHASEN - CONFIDENTIAL
2 Q. Prior to September '03?
3 A. In what capacity?
4 Q. In the design development capacity.
5 A. No, no.
6 Q. What was Rayovac's motivation in
7 developing the CCS-3?
8 A. Marketing's desire for a women's
9 cleaning system.
10 (Exhibit 17 for
11 identification, Multi-page document entitled,
12 "WDF with Cleaning Base Questions," production
13 numbers R 004385 through R 004390.)
14 Q. Mr. Chasen, I've placed before you
15 Exhibit 17, which is a document entitled, "WDF
16 With Cleaning Base Questions, 9/16/03."
17 A. Okay.
18 Q. First, have you seen this document
19 before?
20 A. It doesn't look familiar.
21 Q. I draw your attention to number 5
22 on the first page, which is, "Are there any new
23 technologies or areas of exploration beyond the
24 scope of the CCS-1 that would require
25 investigation?" What was Rayovac's answer to

20 (Pages 74 to 77)

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that question?

A. Their answer to the question was that there was really this new technology meeting the basic method of injecting fluid and having it circulate around would be the same.

However, there were some areas that had to be looked at such as how it gets connected up with the base, meaning the technical connection up at the top, because you've got to appreciate all shavers are different so it's going to be different how you electrically connect at the top.

That was an area that needed to be looked at, the circuit strategy, and electronics a little bit because in that particular model versus the CCS-1, the shaver is run under its own battery power versus the other one is run by a power supply, and it was also a concern that women's deodorants, especially in the underarm area, could affect the shaver as well, and the cleaning fluid getting gunked up as well, that kind of thing.

Q. Are you familiar with Rayovac's costs in the research and development for the

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and development ongoing until a product --

A. I'll tell you -- I'm looking again at Exhibit 15.

Q. Mr. Chasen, let me ask you a different question.

A. To give you some idea, I got an off-tool -- what we call an engineering built sample, and I was evaluating that on May 19th of '04.

An engineering built tool sample is a sample that's almost ready for production; we're getting parts in, we're looking, you know what I mean? I'm just trying to give you a frame of reference here.

Q. Is the engineering tool sample the same as what you referred to earlier as the off-tool sample?

A. Yes.

It was probably June-ish of '04 was probably a good frame of reference for you.

Q. Besides the CCS-1 through 3, are there any other cleaning devices that Remington currently has under development?

A. Yes.

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CCS-1?

A. No idea.

Q. Or the CCS-2 or 3?

A. I don't have any of that information.

Yuri may have some of that, but you would need to talk to a finance guy, I would think.

Q. Do you know how long the research and development of the CCS-2 took as opposed to the CCS-1, which we've spoken about?

A. Well, it's -- to this day we're looking at improvements, so it's hard to -- we didn't just -- you can't draw a line and say we stopped and walked away.

The main effort went from a finite period to when first product was produced, but then, you know, it continued a little bit thereafter, so can you clarify your question a little bit? Do you want to know up to the point it went to production?

Q. I think we established before you turned your attention to the design of CCS-2, in June of '03, how long after that was research

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Q. What are those?

THE WITNESS: I can talk about -- MR. SHIMOTA: Yes.

A. Air cleaning system. It uses high pressure gas to expel hair out of the shaver.

Q. Any other systems?

A. No.

Q. With which shavers is the CCS-1 designed to work? You've mentioned --

A. The R-9500, yes.

There are two shavers, the R-9500 and the --

Q. Is it 9700?

A. It might be. It doesn't have the LCD display. It's just got indicators.

The shaver itself looks exactly the same. Instead of having this LCD display, that's eliminated, and it has, like, lights. I don't remember the exact model number, but you must have it in some of your documents.

(Exhibit 18 for identification, Two-page document, product specifications, production numbers R 004897 through R 004898.)

21 (Pages 78 to 81)

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2 Q. Mr. Chasen, I've put before you
3 Exhibit 18, which is a document dated November
4 15, 2002 called, "R-9500/9700 Micro Flex Plus
5 Rotary Shavers With Cleaning Capacity."

6 A. This is early. They changed the
7 numbers. This is an earlier document. This is
8 dated November of 2002, and they're giving the
9 R-9700 with the LCD display, and I believe this
10 is the R-9500 -- yes. They changed the number
11 since then, since this document, so I don't
12 think this is valid anymore.

13 I'm sure that information is
14 readily available, but there is one other model
15 that doesn't have the LCD display. Yuri would
16 definitely know that off the top of his head.

17 Q. Do you know what the R-9400 is?

18 A. I'm not sure. I'm not sure.

19 I mean, Remington makes so many
20 different models of shaver models that I get
21 confused a little bit with the numbers. I'm
22 most familiar on the ones I worked with, but
23 they make a lot of derivatives.

24 These are really the three main
25 platforms that go with the cleaning system, what

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2 we call the Rotary 9000 series. So it's this
3 exact same shaver, but different bells and
4 whistles, different display. That kind of
5 thing. Same thing with this one. There's
6 another model that has an LCD display.

7 Q. The foil?

8 A. On the foil.

9 And I believe on the women's there
10 might be another iteration as well. So when you
11 say "what models," really, there's three models,
12 base models or platforms, and then one or two
13 derivatives under there are just like very minor
14 things like a display or a button or something
15 like that. There is no big other features
16 really.

17 Q. Who would be aware of the various
18 combinations of shaver and cleaner device?

19 A. Anybody in marketing.

20 Marketing would definitely be able
21 -- Yuri would know that because he deals with
22 that day in and day out. Marketing would be
23 your best shot. If you asked them to produce a
24 matrix, they would probably get that for you as
25 well, and that would, you know --

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1 JAMES CHASEN - CONFIDENTIAL
2 (Exhibit 19 for
3 identification, Multi-page document headed
4 "Men's 2006 Shaving," production numbers
5 R 000133 through R 000184.)

6 Q. I've placed before you Exhibit 19,
7 which is entitled, "Men's 2006 Shaving," dated
8 September 29, 2004.

9 I'm going to ask you to turn to
10 page 45 of that exhibit.

11 A. Okay.

12 Q. This time-line, which is on page
13 45, there is at Q3 2005 a new product listed
14 which says, "New R-9400 with cleaning."

15 Are you aware of that product?

16 A. Yes. I bet you that's the one
17 without the LCD display. That's got to be what
18 that is, 9400.

19 Q. Do you know if that product has
20 been launched by Rayovac?

21 A. Pretty sure, because they were
22 working on that when I was still in Bridgeport,
23 which was, like, about eight months ago,
24 actually, so I believe that that might already
25 be out there.

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2 Q. Would it be the marketing people --
3 A. Marketing people would definitely
4 know or Yuri would know that as well, but I'm
5 pretty sure that that has been done.

6 Q. Mr. Chasen, I'm asking you to look
7 at the CCS-1, which I'm putting before you.
8 Can you tell me what the function
9 of the basin is?

10 A. It's to channel the fluid to the
11 filter.

12 Q. I notice that on the basin of the
13 CCS-1 there are some ribs or tabs. I'm not sure
14 what the technical term would be.

15 A. Right.

16 Q. What is the purpose of those?

17 A. That's so that you don't damage
18 some of these heads as you put it into the unit.
19 So as you put it in, it will kind of just keep
20 it positioned.

21 Q. What supports the shaving head?

22 A. Well, actually, it's the -- you've
23 got a post in the bottom of the basin that acts
24 as a stop and you've got your injection manifold
25 that helps align everything.

22 (Pages 82 to 85)

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- 1 Q. You had just said that the ribs
2 keep the shaver head in place. Isn't that an
3 alignment function?
4 A. Well, really what helps align it is
5 these three -- what guides it are these three
6 pins in the manifold.
7 Q. And does the shaver head rest on
8 those pins?
9 A. Yes. They go inside these holes
10 here and kind of help position it. Then you've
11 got a stop down here.
12 Q. If I could just take that from you
13 and take it apart. Can you tell me what the
14 function of the lower base is, which I've now
15 handed it to you and taken the filter out of?
16 A. It's to hold the cleaning solution.
17 Q. Can you show me on this device
18 where the pump is? I think it's actually on the
19 top portion.
20 A. It's actually right in here, in
21 this casing here, and this is the pump inlet
22 right here.
23 Q. And it's got a filter on the
24 bottom?
25

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- 1 A. Right.
2 Q. And what is the purpose of the
3 pump?
4 A. To circulate the fluid from the
5 lower housing to the manifold, and then the
6 manifold feeds fluid to the hair pocket and then
7 that feeds into the basin, into the filter.
8 Q. Does this CCS-1 device have a
9 drying mechanism?
10 A. Yes.
11 Q. Where is that?
12 A. It's inside here.
13 Do you want me to take this apart?
14 Q. No.
15 A. You could see it here.
16 Do you see the fan in there?
17 Q. You're indicating the top portion?
18 A. Yes, where these vents are. It's
19 located in there, and you can also see a little
20 bit of it right there. The outlet comes right
21 here and it kind of blows some air right
22 underneath the head of the shaver.
23 Q. And what parts does the dryer
24 consist of?
25

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- 1 A. It's got a housing, a fan housing
2 and the fan itself, it's a squirrel cage fan, as
3 we call it, centrifugal fan, so it's basically
4 two parts and they snap together, and then
5 you've got a motor -- also, it's called an
6 impeller fan. It's all the same.
7 Q. Directing your attention to the
8 CCS-2 device, which works with the male foil
9 shaver, can you tell me what the function of the
10 basin is?
11 A. It's exactly the same as the CCS-1.
12 It just channels the fluid down into the filter.
13 A good analogy would be a sink.
14 It's the same exact thing. It just drains it
15 into the filter. That's really what its
16 function is.
17 Q. There's a pivoting number in the --
18 I'm not sure what you call it, but there's
19 something that pivots in the CCS-2 device that I
20 didn't notice in the CCS-1 device.
21 A. You're talking about this thing
22 here and that that flips up and down?
23 Really all this is, it's the
24 manifold -- it's basically the manifold, but
25

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- 1 it's spring-loaded; so it's a spring-loaded
2 manifold is what it is.
3 Q. What is the function of that
4 manifold?
5 A. It's designed to align with the
6 head there.
7 Q. Are there any differences between
8 the CCS-1 and the CCS-2 with regard to the
9 cleaning base? That is the bottom portion.
10 A. Actually, these are
11 interchangeable. I could take this and put that
12 on there and vice versa; so to answer your
13 question, they're exactly the same.
14 Q. What about the pump?
15 A. The pump is exactly the same.
16 Q. And the dryer?
17 A. The dryer is exactly the same.
18 Q. I'm going to hand you the CCS-3
19 which works with the women's shaver.
20 A. I hate this color.
21 Q. Aside from the color differences,
22 is there any difference between the CCS-2 and 3?
23 A. Functionally, it's the same again.
24 The bottom half is the same. The bottom
25

23 (Pages 86 to 89)

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2 housing. The fan is the same.

3 Q. Is the same pump used?

4 A. The same pump is used. It's got a
5 similar, but not exact, design for this
6 manifold. This spring-loaded manifold is
7 slightly different, but in theory it's kind of
8 like the same thing. We only inject in two
9 locations here, where at this we're injecting at
10 four locations.

11 Q. So there's four locations for
12 injections in the male shaver?

13 A. You see these two holes here?
14 That's where the fluid gets injected. On the
15 men's system, the MS 5500, there are four
16 locations. That's what you see there, those
17 four holes.

18 And on the R-9500, there are three
19 locations, so all of the manifolds are different
20 in design, but in function, they're all the
21 same. The outlet from the pump feeds a tube
22 which goes to the manifold, which then injects
23 the fluid into the hair pocket.

24 (A recess was taken.)

25 (Exhibit 20 for

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2 identification, Two-page document entitled, "Co2
3 Rotary Shaver Cleaner Operating Instructions,"
4 production numbers R 010951 through R 010952.)

5 Q. Mr. Chasen, I've placed before you
6 Exhibit 20, which is a document entitled,
7 "Carbon Dioxide Rotary Shaver Cleaner Operating
8 Instructions, Prototype Vintage Number 6."

9 A. Actually, I just did this, so this
10 I'm very familiar with.

11 Q. You created this document?

12 A. Yes.

13 Q. What does this document describe?

14 A. A new cleaning system that we are
15 developing using Co2 cylinders, disposable Co2
16 cylinders to clean a shaver.

17 Q. Is that the air cleaner you were
18 discussing before?

19 A. Yes. The air cleaner -- I've done
20 a lot of evaluation on this type of system, and
21 it's -- do you want the full history or just --
22 I don't want to go on and on, but do you want to
23 just ask specifically about this particular
24 approach?

25 There were some related to this but

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2 weren't powered by CO 2, but in all the systems
3 it relies on pressurized gas released rapidly to
4 extract hair from a shaver, so in its
5 fundamental form, they're all the same in that
6 regard.

7 Q. When did Rayovac begin the design
8 of that product using pressurized gas?

9 A. Do you have my file for that --
10 give me a second. I need to think.

11 I want to say approximately June of
12 '04, approximately. But it wasn't on this exact
13 approach when I started the idea of a different
14 type of cleaning system.

15 Q. What was the motivation behind
16 creating a different type of cleaning system?

17 A. I just didn't like the liquid. It
18 was messy and I saw a lot of negatives
19 associated with that. So I wanted to create a
20 better way of cleaning a shaver that's less
21 messy.

22 In my original approach, we had a
23 little mini compressor that actually charged up
24 a cylinder so you wouldn't even have replaceable
25 Co2 cartridges, and the filter was easy. You

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2 could reuse the filter as well.

3 So from a consumer perspective,
4 they didn't have to buy anything. They could
5 use it every single day. It was clean. They
6 didn't have to deal with flammable alcohol or
7 spilling or mess or anything. So, in my
8 opinion, it's better. It's a better way to go.

9 Q. Can you describe to me how this
10 Exhibit 20 cleaner functions?

11 A. Sure. Actually, that's why I wrote
12 this document, because it's basically a use
13 book.

14 What I did was, I developed a
15 prototype and I wanted to instruct somebody how
16 to use it, so it's a -- let me step back one
17 second.

18 This is a prototype. This is not a
19 production unit, so it's a little bit not as
20 user friendly as it could be.

21 But essentially, you remove this
22 device here off the back of it and unscrew the
23 base and attach a little Co2 cylinder. Did you
24 ever see those little -- like, for whip cream, a
25 little Co2 cartridge?

24 (Pages 90 to 93)

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You put it in there, screw it in place and you put this device back on here. You place the shaver inside the cleaning base. You turn on the shaver and then press the Co2 release mechanism and what it does is give a blast of Co2 directly into the shaver and collects the hair which you remove from the bottom.

Q. From the bottom of --

A. Of the device. It's removable. You see in the photo -- the second page, the very bottom here.

Again, it's a little bit not user friendly, but it was designed to demonstrate to people the principles of this method of cleaning.

So what happens is, it uses an injection manifold like the wet system; but instead of fluid, I'm injecting high pressure Co2, and instead of a basin I've got a rubber seal that goes against the hair pocket of the shaver creating an airtight seal, and then the filter down below catches the hair.

Q. When you say that the rubber seal

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A. And the whole cleaning cycle takes 10 seconds and it's completely dry when you take it out so I don't have to dry the shaver, and the cost of this is substantially lower than any of our wet systems as well, so there's a lot of big advantages to this.

MS. WENDLANDT: Mr. Chasen, I have no further questions.

THE WITNESS: Okay.

MR. SHIMOTA: I would like to note for the record I would like this transcript designated "Highly Confidential, Attorneys' Eyes Only."

(Time Noted: 12:21 P.M.)

JAMES CHASEN

Subscribed and sworn to before me this ____ day of ____, 2005.

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goes against the hair pocket of the shaver --

A. Right.

Q. What do you mean by that?

A. On Exhibit 20, the very top picture, you see this, like, gummy color here around the perimeter that's rubber? That's an elastomeric seal.

When you put the shaver against that, the hair pocket seals up against there, so that's an airtight seal.

So these three opening align with the cutting heads of the shaver.

So when you pressurize the hair pocket, all that muck and hair goes down through those three opening and collects in the filter down below.

Q. Where in this top picture is the manifold?

A. It's inside this black housing here.

You see this little point, that little dot there? That's one of those little nozzles that stick inside the shaver.

Q. Okay.

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25 (Pages 94 to 97)

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CERTIFICATE

I, Linda J. Greenberg, Professional
Shorthand Reporter and Notary Public in and for
the State of New York, do hereby certify that,
JAMES CHASEN, the witness whose deposition is
hereinbefore set forth, was duly sworn and that
such deposition is a true record of the
testimony given by the witness to the best of my
skill and ability.

I further certify that I am neither related
to or employed by any of the parties in or
counsel to this action, nor am I financially
interested in the outcome of this action.

IN WITNESS WHEREOF, I have hereunto set my
hand this 12th day of May, 2005.

Linda J. Greenberg

My commission expires: May 17, 2007

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